

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

THE CENTER FOR INVESTIGATIVE
REPORTING, INC.,

Plaintiff,

v.

OPENAI, INC., OPENAI GP, LLC, OPENAI,
LLC, OPENAI OPKO LLC, OPENAI GLOBAL
LLC, OAI CORPORATION, LLC, OPENAI
HOLDINGS, LLC, and MICROSOFT
CORPORATION,

Defendants.

No. 1:24-cv-04872-SHS-OTW

OPENAI'S MOTION FOR LEAVE TO FILE UNDER SEAL

Under paragraph 21 of the Protective Order in this case (ECF 129) and Section IV of this Court's Individual Practices, Defendant OpenAI¹ respectfully seeks to provisionally file under seal a portion of its letter-motion and accompanying exhibits. The letter-motion seeks a pre-motion conference to address The Center for Investigative Reporting's ("CIR") refusal to add ESI custodians. OpenAI seeks to file portions of the letter-motion and accompanying exhibits under seal because the letter-motion discusses, and the accompanying exhibits contain, testimony that CIR designated as Protected Discovery Material under the Protective Order. ECF 129 ¶ 21. OpenAI does not affirmatively seek to seal any material. Under the Protective Order, CIR has five business days to file a statement of reasons for why the material should be sealed. *Id.* OpenAI will review CIR's filings, and if necessary, confer about any disagreement.

¹ "OpenAI" refers collectively to Defendants OpenAI, Inc.; OpenAI GP, LLC; OpenAI, LLC; OpenAI OpCo, LLC; OpenAI Global LLC; OAI Corporation, LLC; and OpenAI Holdings, LLC.

Dated: April 1, 2025

Respectfully Submitted,

By: /s/ Elana Nightingale Dawson

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